DOCKET SECTION

BEFORE THE
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL MARE DUMAN MENT
OFFICE OF THE SECRETARY

Docket No. R97-1

POSTAL RATE AND FEE CHANGES, 1997)

NASHUA PHOTO INC., DISTRICT PHOTO INC., MYSTIC COLOR LAB, AND SEATTLE FILMWORKS, INC. DESIGNATION OF WRITTEN AND ORAL CROSS-EXAMINATION OF UNITED STATES POSTAL SERVICE WITNESS CRUM (USPS-T28) (November 26, 1997)

Written Cross-Examination

Pursuant to Presiding Officer's Ruling No. R97-1/54, Nashua, District, Mystic, and Seattle, hereby designate the following responses to interrogatories as their written cross-examination of Postal Service Witness Crum:

NDMS/USPS-T-28-27-28a,d,h;-29a-c;-31a;-32a;-33a;-34a;-36a;-37;-and 38a

Pursuant to Rule 4A, two copies of the above documents are submitted herewith to the Secretary of the Commission.

In addition, pursuant to Presiding Officer's Ruling No. R97-1/54, Nashua Photo Inc. (hereinafter "Nashua"), District Photo Inc. ("District"), Mystic Color Lab ("Mystic"), and Seattle FilmWorks, Inc. ("Seattle") reserve the right to designate at the hearing additional responses to their and other discovery to this witness, the responses to which have not yet been received.

Oral Cross-Examination

Further, pursuant to Rule 4B of the Special Rules of Practice, Nashua, District, Mystic, and Seattle request permission to follow up on oral cross-examination of Witness Crum conducted by other parties, and to conduct oral cross-examination regarding his testimony and responses to interrogatories (especially those identified above), including written cross-examination and the following specific subjects: methodologies employed by the Postal Service in developing Witness Crum's supplemental testimony (Appendix K) and how weight and shape affect Standard A Mail costs incurred and avoided.

William J. Olson

John S. Miles

Alan Woll

John F. Callender, Jr.

William J. Olson, P.C.

8180 Greensboro Drive, Suite 1070

McLean, Virginia 22102-3823

(703) 356-5070

Counsel for Nashua Photo Inc., District Photo Inc., Mystic Color Lab, and Seattle FilmWorks, Inc.

CERTIFICATE OF SERVICE

I hereby certify that I have this day served this document upon all participants of record in this proceeding in accordance with section 12 of the Rules of Practice.

William J./Olson

November 26, 1997